

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
FIELDWOOD ENERGY LLC, <i>et al.</i>		
	§	Case No. 20-33948 (MI)
Debtors.¹	§	(Jointly Administered)
	§	Re: Docket No. 1284, 1286

**EMERGENCY MOTION OF DEBTORS FOR ENTRY OF
AN ORDER CONTINUING THE CONFIRMATION HEARING AND
EXTENDING THE DEADLINE TO FILE CONFIRMATION BRIEF**

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

RELIEF IS REQUESTED NO LATER THAN JUNE 4, 2021.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Fieldwood Energy LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), respectfully represent as follows in support of this motion:

Background

1. Commencing on August 3, 2020 (the “**Petition Date**”), the Debtors each filed with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

2. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

3. The Debtors’ chapter 11 cases are being jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 1015-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Local Rules**”).

4. On August 18, 2020, the United States Trustee for Region 7 (the “**U.S. Trustee**”) appointed an official committee of unsecured creditors (the “**Creditors’ Committee**”) pursuant to section 1102 of the Bankruptcy Code. No trustee or examiner has been appointed in these chapter 11 cases.

5. On April 15, 2021, the Court entered the *Amended Order (I) Approving Disclosure Statement and form and Manner of Notice of Disclosure Statement Hearing; (II) Establishing Solicitation and Voting Procedures; (III) Scheduling Confirmation Hearing; (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan; (V) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases; (VI) Approving Procedures for Objections to the Assignment and Transfer of Property of the Estate; and (VII) Granting Related Relief* [Docket No. 1286] (the “**Disclosure**

Statement Order”), which, in relevant part, established the following dates and deadlines (subject to modification as necessary):

- (i) a hearing on the *Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors* [Docket No. 1284] (the “**Plan**”) was scheduled for June 9, 2021 at 9:00 a.m. (prevailing Central Time) (the “**Original Confirmation Hearing**”);
- (ii) a deadline to file objections to the Plan was set for June 2, 2021 at 11:59 p.m. (prevailing Central Time); and
- (iii) a deadline to file a brief in support of confirmation of the Plan and respond to any objections to the Plan (the “**Confirmation Brief**”) was set for June 4, 2021 at 11:59 p.m. (prevailing Central Time).

Jurisdiction

6. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

7. By this motion, pursuant to section 105(a) of the Bankruptcy Code and Rule 9006(b) of the Bankruptcy Rules, the Debtors request entry of an order (i) adjourning the Original Confirmation Hearing to **June 18, 2021 at 9:30 am (prevailing Central Time)** (as may be further adjourned, the “**Confirmation Hearing**”) and (ii) extending the deadline to file a Confirmation Brief to **five (5) days prior to the Confirmation Hearing**.

8. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A** (the “**Proposed Order**”).

Relief Requested Should Be Granted

9. Section 105(a) of the Bankruptcy Code authorizes a court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the

Bankruptcy Code.” 11 U.S.C. § 105(a). Bankruptcy Rule 9006(b) authorizes courts to enlarge the time periods within which certain actions must be taken, and states, in pertinent part, that:

when an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of the court, the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefore is made before the expiration of the period originally prescribed or as extended by a previous order.

Bankruptcy Rule 9006(b).

10. Since entry of the Disclosure Statement Order, the Debtors have continued to engage in discussions with various stakeholders and reach additional agreements with certain of the Debtors’ predecessors in interest. *See Notice of Filing of Executed Term Sheet by and Between the Debtors and Hunt Oil Company and its Subsidiaries* [Docket No. 1392]; *see also Notice of Filing of Executed Term Sheet by and Between the Debtors and Eni Petroleum US LLC and its Subsidiaries* [Docket No. 1368]. In the near term, the Debtors expect to finalize and file their remaining Plan Supplement documents and continue to engage in productive discussions with key stakeholders.

11. In light of the recent progress made with various stakeholders and the Debtors’ expectation of making additional progress with several of their stakeholders over the next few days, the Debtors request a short adjournment of the Confirmation Hearing and an extension of the deadline to file a Confirmation Brief. The Debtors submit that continuing the Confirmation Hearing and extending the Debtors’ deadline to file a Confirmation Brief is reasonable under the circumstances and will not prejudice any party in interest.

Emergency Consideration

12. The Debtors respectfully request emergency consideration of this motion in accordance with Bankruptcy Local Rule 9013-1. Given that the Confirmation Hearing is currently

scheduled for June 9, 2021 at 9:00 am (prevailing Central Time) and the deadline to file a Confirmation Brief is June 4, 2021, the Debtors submit that emergency consideration of the motion is necessary and appropriate.

Notice

13. Notice of this motion will be provided to any party entitled to notice pursuant to Bankruptcy Rule 2002 and any other party entitled to notice pursuant to Bankruptcy Local Rule 9013-1(d).

No Previous Request

14. No previous request for the relief sought herein has been made by the Debtors to this or any other court.

WHEREFORE the Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: June 4, 2021
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez
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*Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on June 4, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ *Alfredo R. Pérez*
Alfredo R. Pérez